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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

WESTINGHOUSE ELECTRIC COMPANY  
LLC,

*et al.*,

Debtors.

Chapter 11

Case No. 17-10751 (MEW)

(Jointly Administered)

WESTINGHOUSE ELECTRIC COMPANY  
LLC, *as reorganized*

Plaintiff,

v.

Adv. Proc. No. 19-01109-(MEW)

SOUTH CAROLINA PUBLIC SERVICE  
AUTHORITY

Defendant.

**DEFENDANT SOUTH CAROLINA PUBLIC SERVICE AUTHORITY'S  
MOTION TO WITHDRAW THE REFERENCE**

TO THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK:

Defendant South Carolina Public Service Authority (“Santee Cooper”), the defendant in the captioned adversary proceeding, respectfully moves the United States District Court for the Southern District of New York for an order, pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and Rule 5011-1 of the Local Rules of the Bankruptcy Court, withdrawing the reference of the captioned adversary proceeding to the Bankruptcy Court for the reasons set forth in the accompanying memorandum of law, which is incorporated herein by reference.

Santee Cooper has made no prior request to this Court or to any other court for the relief requested by this Motion. Santee Cooper submits this Motion without prejudice to, and without waiver of, any rights, arguments or defenses that Santee Cooper might have at law or in equity, including defenses based on lack of subject matter or personal jurisdiction.

WHEREFORE, South Carolina Public Service Authority respectfully request that the Court enter an Order granting the relief requested herein, and such other and further relief as the Court deems just and proper.

Dated: May 8, 2019  
New York, New York

Respectfully submitted,

*/s/ Michael J. Venditto*

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